



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 1, 2004

RQ-2

Mary Rose Adkins, Treasurer  
NRA Political Victory Fund  
11250 Waples Mill Road  
Fairfax, VA 22030

Response Due Date:  
December 31, 2004

Identification Number: C00053553

Reference: 12 Day Pre-General Report (10/1/04-10/13/04)

Dear Ms. Adkins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Your report discloses a payment(s) on Schedule D to "Edmonds - Hackney & Associates, Inc.," which has not been recorded on a disbursement schedule. Debt payments must be reflected on Schedule B or E as well as on Schedule D. Please amend your report to clarify this discrepancy. 2 U.S.C. §434(b)(5)(D)

-Schedule E of your report indicates that your committee may have failed to file and/or timely file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20<sup>th</sup> day before an election. The notice must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

-Your committee filed a 48 hour notice informing the Commission of independent expenditures made in opposition to John Kerry for "T-Shirts (estimated costs)." However, the amounts and dates of public dissemination disclosed on these notices do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

-Schedule E of your report discloses the Calendar Year-To-Date Per Election for Office Sought total for Mel Martinez to be \$57,357.45. However, FEC calculations disclose this amount(s) to be \$44,946.89. Please amend your report to clarify this discrepancy.

-The 48 Hour Notice filed 10/6/04 discloses the Calendar Year-To-Date Per Election for Office Sought total for John Kerry to be \$0.00. However, FEC calculations disclose this amount(s) to be \$2,130,291.58. Please amend your report to clarify this discrepancy.

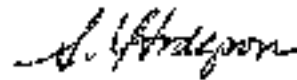
-The 48 Hour Notice filed 10/13/04 discloses the Calendar Year-To-Date Per Election for Office Sought total for John Kerry to be \$0.00. However, FEC calculations disclose this amount(s) to be \$2,216,544.08. Please amend your report to clarify this discrepancy.

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any

questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1140.

Sincerely,



Abbie Hodgson  
Campaign Finance Analyst  
Reports Analysis Division

## Failed to Timely File

Name of Payee	Date	Amount	Purpose	Candidate
Edmonds - Hackney & Associates, Inc.	10/8/04	\$37,546.00	Newspaper Ad	John Kerry

## Failed to File

Name of Payee	Date	Amount	Purpose	Candidate
National Rifle Association of America	10/1/04	\$57.32	Postage	John Kerry
Edmonds - Hackney & Associates, Inc.	10/6/04	\$48,706.50	Newspaper Ad P	George W. Bush
Edmonds - Hackney & Associates, Inc.	10/6/04	\$25,489.00	Newspaper Ad P	Pete Coors
Edmonds - Hackney & Associates, Inc.	10/6/04	\$18,400.00	Newspaper Ad P	Mel Martinez
Edmonds - Hackney & Associates, Inc.	10/6/04	\$20,617.00	Newspaper Ad P	Johnny Isakson
Edmonds - Hackney & Associates, Inc.	10/6/04	\$57,792.00	Newspaper Ad P	Richard Burr
Edmonds - Hackney & Associates, Inc.	10/6/04	\$5,132.00	Newspaper Ad P	Heather Wilson
Edmonds - Hackney & Associates, Inc.	10/6/04	\$17,607.50	Newspaper Ad P	Arlen Specter
Edmonds - Hackney & Associates, Inc.	10/6/04	\$25,593.00	Newspaper Ad P	James Demini
National Rifle Association of America	10/8/04	\$1,225.05	Postage	John Kerry

